

MAIL STOP RCE

PATENT

Customer No. 22,852

Attorney Docket No. 06761.0054

**REMARKS**

The Office Action mailed November 28, 2005 rejected claims 7-20 under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 6,030,326 to Azuma et al. or U.S. Patent No. 5,382,213 to Kopel et al. or alternatively rejected claims 7-20 under 35 U.S.C. § 103(a) as obvious over Azuma et al. or Kopel et al.

By this amendment, Applicants have amended 7 and canceled claims 12-20 and added new claims 21-23. No new matter has been added.

Applicants respectfully traverse the rejection of claims 7-11 under 35 U.S.C. § 102(b) as anticipated by Azuma et al. or, alternatively, Kopel et al.

To establish a *prima facie* case of anticipation under 35 U.S.C. § 102, the Patent Office must show that a single reference teaches each and every element of the claim. No *prima facie* case has been established with respect to independent claim 7 for at least the reasons that neither Azuma et al. nor Kopel et al. teaches each and every element of claim 7.

For example, independent claim 7 recites a tool replacement method including, among other things, “positioning a spindle relative to a nut driving station wherein the nut driving station comprises a forward nut driver and a reverse nut driver.” Neither of the cited references teaches at least positioning a spindle relative to a nut driving station wherein the nut driving station comprises a forward nut driver and a reverse nut driver. Because neither of the cited references teaches every claim element, independent claim 7 is in condition for allowance.

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Furthermore, dependent claims 8-11 are also in condition for allowance at least by virtue of their dependence from independent claim 7.

Applicants respectfully traverse the rejection of claims 7-11 under 35 U.S.C. § 103(a) as obvious over Azuma et al. or, alternatively, Kopel et al.

To establish a *prima facie* case of obviousness under 35 U.S.C. § 103(a), the Patent Office must show that the prior art references, taken alone or in combination, teach or suggest each and every element of the claim. No *prima facie* case has been established with respect to independent claim 7 for at least the reason that neither of the cited references, taken alone or in combination, teaches or suggests each and every element of claim 7. Because neither of the cited references teaches or suggests at least positioning a spindle relative to a nut driving station wherein the nut driving station comprises a forward nut driver and a reverse nut driver, no *prima facie* case of obviousness has been established and independent claim 7 is in condition for allowance.

Furthermore, dependent claims 8-11 are also in condition for allowance at least by virtue of their dependence from claim 7.

Applicants respectfully traverse the rejection of claims 12-20 under 35 U.S.C. § 102(b) as anticipated by Azuma et al. or Kopel et al. or, in the alternative, under 35 U.S.C. § 103(a) as obvious over Azuma et al. or Kopel et al. By this amendment, Applicants have cancelled claims 12-20, thereby rendering the rejection of claims 12-20 moot.

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Applicants respectfully submit that corresponding new claims 21-23 are allowable for at least the reason that neither of the cited references, taken alone or in combination, teaches or suggests every claim element. For example, independent claim 21 recites a tool replacement method including, among other things, "positioning a spindle relative to a nut driving station wherein the nut driving station comprises a forward nut driver and a reverse nut driver, each of the forward nut driver and the reverse nut driver having a respective forward-rotating or reverse-rotating nut driver and a unidirectional spindle rotation preventor axially aligned with each other." Neither of the cited references, taken alone or in combination, teaches or suggests at least "positioning a spindle relative to a nut driving station wherein the nut driving station comprises a forward nut driver and a reverse nut driver, each of the forward nut driver and the reverse nut driver having a respective forward-rotating or reverse-rotating nut driver and a unidirectional spindle rotation preventor axially aligned with each other." Because the cited references do not teach or suggest every claim element, independent claim 21 is in condition for allowance.

Furthermore, dependent claims 22-23 are also in condition for allowance at least by virtue of their dependence from independent claim 21.

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration of this applicant and the timely allowance of the pending claims.

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Please grant any extensions of time required to enter this response and charge  
any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

Dated: February 23, 2006

By:



David W. Hill

Reg. No. 28,220